

RCRA/ACT 64 INSPECTION REPORT

US EPA RECORDS CENTER REGION 5



429020

U.S. EPA I.D. Number M 1 D 0 2 0 9 0 6 7 6 4
(or Michigan)

FACILITY NAME

(Mailing Address)

Detrex Chemical IndustriesGold Shield Solvent Division312 ElsworthGrand Rapids

CITY

MICHIGAN

49503

ZIP CODE

DATE 6-13-88 TIME OF INSPECTION (FROM) 9:00^{AM} (TO) 11:30 P.M.

PERSON(S) INTERVIEWED

TITLE

TELEPHONE

Sharon BurnsSecretary454-9269

INSPECTOR(S)

AGENCY/TITLE

TELEPHONE

DALE DEKRAKERMDNR(616) 456-5071

Primary Business of this Facility:

Transports and stores RAW and spent
chlorinated solvents

Reason for Inspection:

☒ Routine ☐ Follow-up ☐ Complaint

Based upon the inspection, this facility:

- ☐ is a non-generator/liquid industrial waste generator
☐ conditionally exempt small quantity generator
☐ small quantity generator
☒ generator
☒ transporter
☒ treatment/storage/disposal facility

FORM

A
A
A
B
C
DDate of Last Inspection MAY 27, 1987PART B Permit called in 5/88

INSPECTION FORM D

Part 6 of Rules

P.A. 64 of 1979

TREATMENT, STORAGE, DISPOSAL FACILITY

This Facility:

- ☒ Generates Hazardous Waste (Also use Generator Appendix)
- ☐ Treats Hazardous Waste
- ☒ Stores Hazardous Waste
- ☐ Disposes of Hazardous Waste
- ☒ Transports Hazardous Waste (Also use Form C)

This Facility:

- ☒ Accepts wastes from off-site sources
- ☐ Handles only its own wastes

If applicable, hazardous waste is stored in the following:

- ☒ Drums (Containers)
- ☐ Above-ground tanks
- ☐ Underground tanks
- ☐ Waste piles
- ☐ Lagoons
- ☐ Other
- ☐ Not applicable

If applicable, hazardous wastes are treated/disposed in the following:
(Attach appropriate checklist)

- ☐ Surface Impoundments
- ☐ Waste piles
- ☐ Land Treatment
- ☐ Landfills
- ☐ Incineration/Thermal Treatment
- ☐ Chemical, Physical and Biological Treatment
- ☐ Above-ground tanks

INSPECTION D

☐ Underground tanks
☐ Drums
☐ Other
☐ Not applicable

WASTE STREAMS

Hazardous Waste Code/Name	Source	Type of Storage	How Much
F001	Generators	Drum	60/mo. *
F002	"	"	

* Picked up from generators and transported for storage

INSPECTION FORM D
Part 6 Rules
P.A. 64 of 1979

HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITY
Applies to Those Facilities That Do Not Have an Act 64 Permit

General Facility Standards

Rule 601, 40 CFR 265, Subpart B

	Yes	No	N/A	Violation Class
1. <u>If required</u> , have the following been notified:				
a.) Notified Director of receipt of hazardous waste from a foreign source? 265.12(a)	___	___	✓	II
b.) Notified Director of change of owner or operator. 40 CFR Part 270. 265.12(b)	___	___	✓	II

Comments:

No Foreign wastes recieved

No changes in ownership

2. General Waste Analysis: 265.13

a.) Has the owner or operator obtained a detailed chemical and physical analysis of the waste? 265.13(a)	✓	___	___	I
b.) Does the owner or operator have a detailed waste analysis plan on file at the facility? 265.13(b).	✓	___	___	I
c.) Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site? 265.13(c)	✓	___	___	I

Comments:

PLAN for Grand Rapids is a simple test for specific gravity. More complex tests are performed in Detroit.

INSPECTION FORM D

Violation
Class

3. Security - If applicable, do security measures include:

	Yes	No	N/A	Class
a.) 24-hour surveillance? 265.14(b)(1)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	I
or				I
b.) i. Artificial or natural barrier around facility? 265.14(b)(2)(i)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
and				
ii. Controlled entry? 265.14(b)(2)(ii)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
c.) Danger sign(s) at entrance? 265.14(c)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I

Comments: Building is locked at night

4. Owner or operator inspections: 265.15*

a.) Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and discharges of hazardous waste that may affect human health or the environment? 265.15(a)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
b.) Does the owner or operator have a written inspection schedule at the facility? 265.15(b)(1)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
c.) If so, does the schedule address the inspection of the following items:				
i. Monitoring equipment? 265.15(b)(1)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	II
ii. Safety and emergency equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
iii. Security devices? 265.15(b)(1)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
iv. Operating and structural equipment (i.e. dikes, pumps, etc.)? 265.15(b)(1)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II

* These violations are Class II, unless observations of hazardous conditions or violations are noted in the log and not corrected which result in the release or actual harm to the environment or human health; in such instances violations are Class I.

INSPECTION FORM D
Violation
Class

	Yes	No	N/A	Class
v. Type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?	✓			II
vi. inspection frequency (based upon the possible deterioration rate of the equipment)? 265.15(b)(4)	✓			II
d.) Are areas subject to spills inspected daily when in use? 265.15(b)(4)	✓			II
e.) Does the owner or operator maintain an inspection log or summary of owner or operator inspections?	✓			II
f.) Does the inspection log contain the following information: 265.15(d)				
i. The date and time of the inspection? 265.15(d)	✓			II
ii. The name of the inspector? 265.15(d)	✓			II
iii. A notation of the observations made? 265.15(d)	✓			II
iv. The date and nature of any repairs or remedial actions? 265.15(d)	✓			II

Comments:

*Daily, Bi-weekly And weekly inspections.
Logs are well kept and up to date.*

5. Do personnel training records include: 265.16

a.) Job titles? 265.16(d)(1)	✓			I
b.) Job descriptions? 265(d)(2)	✓			I
c.) Description of training? 265.16(d)(3)	✓			I

INSPECTION FORM D

Violation
Class

Yes No N/A

d.) Records of training?
265.16(d)(4)

✓

II

e.) Do new personnel receive re-
quired training within six
months? 265.16(d)

✓

I

f.) Do personnel training records
indicate that personnel have
taken part in an annual review
of training? 264.16(c)

✓

I

Comments:

No new personnelProposed training was cancelled in October, 1987
by MSU. Company will review training itself or with
another contractor.6. If required, are the following special
requirements for ignitable, reactive, or
incompatible wastes addressed?
265.17

✓

I

a.) Special handling? 265.17(a)

✓

I

b.) No smoking signs? 265.17(a)

✓

I

c.) Separation and protection from
ignition sources? 265.17(a)

✓

I

Comments:

No ignitable, reactive or incompatible
waste handled.PREPAREDNESS AND PREVENTION

Rule 606, 40 CFR 265, Subpart C

1. Is there any evidence of fire, explosion,
or release of hazardous waste or hazard-
ous waste constituents 40 CFR Rule 265.31

✓

I

Comments:

INSPECTION FORM D

Yes	No	N/A	Violation Class
-----	----	-----	-----------------

2. If required, does this facility have the following equipment: 40 CFR 265.32

a.) Internal communications or alarm systems. 40 CFR 265.32(a)

✓			I
---	--	--	---

b.) Telephone or 2-way radios at the scene of operations. 40 CFR 265.32(b)

✓			I
---	--	--	---

c.) Portable fire extinguishers, fire control, spill control equipment and decontamination equipment. 40 CFR 265.32(c)

✓			I
---	--	--	---

d.) Indicate the volume of water and/or foam available for fire control.

City water - unlimited supply

Comments: Voice contact - small plant

Telephones in building - intercom system also

Sorbents, empty drums, shovels

3. Testing and Maintenance of Emergency Equipment: 265.33

a.) Has the owner or operator established testing and maintenance procedures for emergency equipment? 265.33

✓			
---	--	--	--

b.) Is emergency equipment maintained in operable condition? 265.33

✓			
---	--	--	--

c.) If required, has owner or operator provided immediate access to internal alarms? 40 CFR 265.34(a)

✓			
---	--	--	--

d.) Is there adequate aisle space for unobstructed movement for personnel and emergency equipment. 40 CFR 265.35.

✓			I
---	--	--	---

INSPECTION FORM D

	Yes	No	N/A	Violation Class
Comments: <u>Extinguishers - tested At least 2 x yearly</u>				
<u>Scott Air Pack - same time</u>				

4. Has the owner or operator attempted to make arrangements with local authorities in case of emergencies.
40 CFR 265.37

✓			II
---	--	--	----

Comments: Company called on All Facilities. Fire Dept.,
Police And hospitals have been given copies of MSDS.
Well documented.

CONTINGENCY PLAN AND EMERGENCY PROCEDURES

Rule 607, 40 CFR 265 Subpart D.

1. Does the contingency plan contain the following information:

- a.) The actions facility personnel must take to comply with 265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (As applicable).
265.52(a)

✓			I
---	--	--	---

- b.) Arrangements or attempts to make arrangements agreed to by local police departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to 40 CFR 265.52(c) 265.37

✓			II
---	--	--	----

- c.) Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator. 40 CFR 265.52(d)

✓			II
---	--	--	----

INSPECTION FORM D

Violation
ClassYesNoN/AClass

- d.) A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities. 40 CFR 265.52(e) ✓ II
- e.) An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.) 40 CFR 265.52(f) ✓ II
- f.) Is the facility emergency coordinator identified. 40 CFR 265.55 ✓ II
- g.) Is coordinator familiar with all aspects of site operation and emergency procedures. 40 CFR 265.55 ✓ II
- h.) Does the Emergency Coordinator have the authority to carry out the Contingency Plan. 40 CFR 265.55 ✓ II
- i.) If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures listed in 265.56. ✓ I
- j.) Has contingency plan been amended to reflect changes in regulations, plan failure, changes in the facility, list of emergency coordinators, changes in emergency equipment. 40 CFR 265.54 ✓ II

Comments:

SHARON BUENS is primary emergency coordinator
PLAN has never had to be implemented.

INSPECTION FORM D

	Yes	No	N/A	Violation Class
2. Are copies of the contingency plan available at site and local emergency organizations. 40 CFR 265.53(a) 264.53(b)	✓	—	—	II

Comments:

Written documentation on file from
LOCAL organizations

USE OF MANIFEST SYSTEM

Rule 601(2)(b)

1. Does this facility receive hazardous waste accompanied by a manifest. If yes, complete the following: — yes

a.) Are copies signed and dated. Rule 608(1)(a)	✓	—	—	I
b.) Are significant discrepancies noted on the manifest. Rule 608(1)(b)	✓	—	—	I
c.) Are transporters given 1 copy of the signed manifest. Rule 608(1)(c)	✓	—	—	I
d.) Are copies sent to the generator within 30 days. Rule 608(1)(d)	✓	—	—	I
e.) Are copies of the manifest retained for 3 years.	✓	—	—	I
f.) Are copies of the manifest returned to DNR within 10 days after end of month. Rule 608(1)(f)	✓	—	—	II

Comments:

INSPECTION FORM D

Yes No N/A Violation
Class

2. Does this facility ship hazardous waste off-site. If yes, complete Generator Appendix. Rule 608(3)

✓ — — — N/A

Comments:

Company re-ships accumulated solvents
to Detroit for reclaim

3. For unreconciled significant discrepancies in manifests has the Director been notified. Rule 608(4)

— — ✓ — I

Comments:

No discrepancies have been noted.

RECORDKEEPING

Rule 601(3) 40 CFR 265. Subpart E

1. Does the owner or operator of this facility maintain an operating record? Rule 609(1)

✓ — — — II

Comments:

Drum pick-up and shipment logs

2. Does this operating record contain: 265.73

- a.) The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265.73(b)(1) Appendix E

✓ — — — II

INSPECTION FORM D

	Yes	No	N/A	Violation Class
--	-----	----	-----	--------------------

- | | | | | |
|--|---|---|---|----|
| b.) The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.) 265.73(b)(2) | ✓ | — | — | II |
| c.) If this facility disposes of hazardous waste on-site, is there a map or diagram of disposal area. 265.73(b)(2) | — | — | ✓ | II |
| d.) Records and results of all waste analyses, trial tests, monitoring data, and operator inspections? 265.73(b)(3) | ✓ | — | — | II |
| e.) Reports detailing all incidents that required implementation of the Contingency Plan? 265.73(b)(4) | — | — | ✓ | II |
| f.) Records and results of inspections as required in 40 CFR 264.15(d) 265.73(b)(5) | ✓ | — | — | II |
| g.) <u>If required</u> , monitoring, testing, or analytical when required by construction permit or operating license. Rule 265.73(b)(6) | — | — | ✓ | II |
| h.) Closure and post closure cost estimates. 265.73(b)(7) | ✓ | — | — | II |

Comments: Some documents under separate covers

- | | | | | |
|--|---|---|---|----|
| 3. Are all required records available and maintained for at least 3 years. 265.74(3) | ✓ | — | — | II |
|--|---|---|---|----|

INSPECTION FORM D

Yes	No	N/A	Violation Class
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Comments: _____

REPORTING

1. Has the owner or operator submitted a biennial report to the required administration by March 1 of even numbered years? 265.75

✓	—	—	II
---	---	---	----

Comments: _____

1987 report was filed

2. If applicable, for TSD's that receive hazardous waste from off-site sources. Rule 265.76

✓	—	—	I
---	---	---	---

- a.) Has the facility accepted any hazardous waste from an off-site generator subject to Rule 205 without a manifest or shipping paper?

—	✓	—	I
---	---	---	---

- b.) If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.

—	—	—	I
---	---	---	---

USE AND MANAGEMENT OF CONTAINERS

Drums/Roll-off Boxes/Gondolas

1. Is hazardous waste accumulated in containers? If no, skip to tank section. ✓

N/A

2. a.) Is each container clearly marked with accumulation date and hazardous waste number Rule 306(1)(c)?
If no, how many

✓	—	—	I
---	---	---	---

INSPECTION FORM D

	Yes	No	N/A	Violation Class
b.) Has more than 90 days elapsed since date marked (Operating license needed as required in Part 5 of Rules) If yes, how many drums _____ Accumulation dates _____			✓	I
c.) Is each container labeled or marked clearly with the words "Hazardous Waste" rule 306(c). If no, how many _____	✓			I
d.) Are containers in good condition Rule 306(1)(a), 40 CFR 265.171. If no, specifically what is their conditions. _____	✓			I
e.) Are containers compatible with waste in them. RULE 306(1)(a) 40 CFR 265.172. If no, explain _____	✓			I
f.) Are containers stored closed, Rule 306(1)(a), 40 CFR 265.173(a) If no, how many _____	✓			I
g.) Are containers managed to prevent leaks? Rule 306(1)(a), 40 CFR 265.173(b) If no, explain _____	✓			I
h.) Are containers inspected weekly for leaks and defects? Rule 306(1)(a) 40 CFR 265.174.	✓			I
i.) Are ignitable and reactive wastes stored at least 15 meters (50 Feet) from property line? (Indicate if waste is ignitable or reactive) Rule 306(1)(a) 40 CFR 265.176. If no, explain _____			✓	I
j.) Are incompatible wastes stored in separate containers (If not the provisions of 40 CFR 265.17(b) apply) Rule 306(1)(a) 40 CFR 265.176. If no, explain _____			✓	I

INSPECTION FORM D

	Yes	No	N/A	Violation Class
k.) Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? Rule 306(1)(a) 40 CFR 265.177.			✓	I

Comments:

No incompatibles

3. If storing free liquid, does hazardous waste storage area include: rule 306(1)(a) 40 CFR 264.175.

a.) Impervious base free of cracks. 40 CFR 264.175(b)(1)

✓			I
✓			I

b.) Containment capable of holding 10% of volume of containers or 10% of largest container whichever is greater.

Comments:

Company uses basement as containment for container storage on first floor.

4. Is hazardous waste being accumulated at the point of generation, Rule 306(2)

	✓		N/A
--	---	--	-----

If yes:

a.) Is container less than 55 gallons or one quart of acutely hazardous waste? Rule 306(2)

			I
--	--	--	---

b.) Is container under control or operator and near point of generation and under control of operator? Rule 306(2)

			I
--	--	--	---

c.) Are containers in good condition? Rule 306(2) 40 CFR 265.171

			I
--	--	--	---

INSPECTION FORM D

Violation

	Yes	No	N/A	Class
--	-----	----	-----	-------

d.) Are containers compatible with waste in them? Rule 306(2) 40 CFR 265.172

I

e.) Are containers stored closed when not in use and managed to prevent leaks? Rule 306(2) 40 CFR 265.173

I

f.) Are containers marked with the words "Hazardous Waste" and waste number (or other words that identify the contents) Rule 306(2)

I

Comments:

TANKS

1. Is hazardous waste accumulated in tanks?
If no, skip to c.

N/A

a.) Is each tank labeled or marked with the words "Hazardous Waste", Rule 306(1)(a), 40 CFR 252.34(a)

I

b.) Are tanks used to store only those wastes which will not cause corrosion, leaking or premature failure of the tank? Rule 306(1)(a), 40 CFR 262.192(b).

I

c.) Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structure. Rule 306(1)(a), 40 CFR 265.192(c)?

I

d.) Do continuous feed systems have a wastefeed cutoff? Rule 306(1)(a), 40 CFR 265.192(d).

I

e.) Are required daily and weekly inspections done? Rule 306(1)(a), 40 CFR 265.194?

II

INSPECTION FORM D

Yes	No	N/A	Violation Class
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f.) Are reactive and ignitable wastes in tanks protected or rendered non-active or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements. 261.21 or 261.23 Rule 306(1)(a), 40 CFR 265.199

II

g.) Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.) Rule 306(1)(a), 40 CFR 265.199.

I

h.) Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes? Rule 306(1)(a) 40 CFR 198 (3)(b)

I

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet.

(See tables 2-1 through 206 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

Comments:

*TANK Storage Formerly existed but
has been discontinued.*

2. Do above ground tanks have a 150% containment area constructed of impervious material, or if tanks hold incompatible wastes is each tank structurally enclosed? Rule 615(3)

I

INSPECTION FORM D

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Violation Class</u>
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Comments: _____

3. Do owners and operators of underground tanks do all the following:

a.) Provide secondary adequate containment and leachate collection system. Rule 615(4)(a)

_____	_____	_____	I
-------	-------	-------	---

b.) Conduct an inventory of the contents of the tanks at least twice a month. rule 615(4)(b)

_____	_____	_____	I
-------	-------	-------	---

c.) Conduct leachate sampling at least once a year. Rule 615(4)(c)

_____	_____	_____	I
-------	-------	-------	---

d.) Maintain an accurate inventory of the tank. Rule 615(4)(d)

_____	_____	_____	I
-------	-------	-------	---

Comments: _____

4. Is hazardous waste accumulated in other than tanks or containers? If yes, explain _____.

_____	✓	_____	N/A
-------	---	-------	-----

Comments: _____

INSPECTION FORM D

CLOSURE AND POST CLOSURE (Part 265 Subpart G)
Part 7 of Act 64 Rules

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Violation Class</u>
1. Closure 265.112				
a.) Is the facility closure plan available for inspection?	✓	—	—	I
b.) Does the plan identify				
i. maximum extent unclosed during facility life?	—	—	✓	I
ii. maximum hazardous waste inventory?	✓	—	—	I
iii. estimated year of closure	✓	—	—	I
iv. schedule of closure activities	✓	—	—	I
Comments:	<u>300 DRUMS OF F001 Total cost is ~ \$10,000</u> <u>10 DRUMS OF F002 AS OF 1-6-88</u> <u>Estimated year is 2050 A.D.</u>			

*2. Post-Closure 265.118 - Act 64 Rules

a.) Is the post-closure plan available for inspection?	—	—	—	I
b.) Does this plan contain:				
i. description of groundwater monitoring activities and frequencies?	—	—	—	I
ii. description of maintenance activities and frequencies for				
AA. integrity of cap. final cover, or containment structures, where applicable.	—	—	—	I
BB. facility monitoring equipment.	—	—	—	I

INSPECTION FORM D

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Violation</u> <u>Class</u>
iii. name, address, and phone number of person or office to contact during post- closure care period?	_____	_____	_____	I _____
c.) Has the post-closure period begun?	_____	_____	_____	N/A _____
d.) Is the written post-closure cost estimate available? 265.144	_____	_____	_____	I _____

Comments: _____

* Applies only to disposal facilities.

	Yes	No	N/A	Violation Class
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GENERATOR APPENDIX

Section A: Scope

Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Manifest Requirements

- | | | | | | |
|----|---|---|---|---|----|
| 1. | a.) Does the generator have copies of the manifest available for review and on-site. 262.40 | ✓ | — | — | II |
| | b.) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period. | 8 | — | — | — |

Comments: Shipments consist of waste solvent sent to Detroit for reclaim, following storage in Grand Rapids

2. Do the manifest forms examined contain the following information (If so, make copies of, or record information from manifests that do not contain the critical elements:

- | | | | | |
|---|---|---|---|----|
| a.) Manifest document number (Rule 304(2)(a)? | ✓ | — | — | II |
| b.) The generator's name, mailing address, telephone number, and EPA Identification number. Rule 204(2)(b) | ✓ | — | — | II |
| c.) The name and EPA ID number of transporter. Rule 304(2)(c) | ✓ | — | — | II |
| d.) Name, address, and EPA ID number of designated permitted facility and alternate facility. Rule 304(2)(d) | ✓ | — | — | II |
| e.) The description of waste(s) (DOT shipping name, DOT hazard class, DCT identification number. Rule 304(2)(e) | ✓ | — | — | II |

GENERATOR APPENDIX

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Violation Class</u>
f.) The total quantity of waste(s) and the type and number of containers loaded. Rule 304(1)(f)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
g.) Hazardous waste number describing the wastes. Rule 304(1)(g)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
h.) Certification as required in Rule 304(1)(h)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
i.) Signatures as required in Rule 304(4)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
j.) Waste minimization program/certification	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I

Comments: F001 OR F002

Designated Facility is Gold Shield Solvents in
Detroit MID 091605972

3. Reportable exceptions. Rule 308(3), 40 CFR 262.42

a.) For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NCT received a signed copy from the designated facility within 35 days of the date of shipment. 0

☒ ☐ ☐ I

b.) For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. 0

☒ ☐ ☐

Comments: _____

Form C
Transporter of Hazardous Waste

- | | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Violation Class</u> |
|---|------------|-----------|------------|------------------------|
| 11. Has the required lettering and decals been removed on those vehicles no longer used to transport hazardous waste? | — | — | ✓ | <u>N/A</u> |
| 12. Identify the vehicles inspected at the facility, including those licensed under Act 64 of 1979 and Act 136 of 1969. | | | | |

Vehicle Name and ID No.	License Decal No.	Do these match the licenses?		Is decal(s) expired?		Licensed Under 64/136	
		<u>Yes</u>	<u>No</u>	<u>Yes</u>	<u>No</u>	<u>Yes</u>	<u>No</u>
_____	_____	—	—	—	—	—	—
_____	_____	—	—	—	—	—	—
_____	_____	—	—	—	—	—	—
_____	_____	—	—	—	—	—	—
_____	_____	—	—	—	—	—	—
_____	_____	—	—	—	—	—	—

Comments No vehicle on-site DURING inspection

13. Describe the vehicle storage/parking and repair areas. Example: (Paved or gravel, location of drains, etc.). Include sketch of area.

Comments Vehicle is stored inside on ramp
Over-night - not stored loaded. Ramp is
concrete and locked at night.

Form C
Transporter of Hazardous Waste

	Yes	No	N/A	Violation Class
9. Has this transporter experienced a discharge, loss or spill of hazardous wastes during transportation? Rule 410	—	✓	—	N/A
If yes, was the following done:				
a.) Notification of the Director (or his designee) Rule 410(3)(a)	—	—	—	I
b.) If required, give notice to the National Response Center? Rule 410(3)(b), 40 CFR 171.15	—	—	—	I
c.) If required, prepare a report in writing to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation Rule 410(3)(c), 40 CFR 171.16	—	—	—	I
d.) Cleaned up any hazardous waste discharged that occurred and/or take appropriate action so that there is no longer a hazard to human health or the environment. Rule 410(5)	—	—	—	I

Comments Company has equipped vehicle for
spills

10. Are all vehicles marked as required in Rule 406(6) including the following on both sides of vehicle.

a.) The words "Hazardous Waste Hauling Vehicle" Rule 406(6)(a)	✓	—	—	II
b.) Company name, city and state Rule 406(6)(a)	✓	—	—	II
c.) Letters at least 5 centimeters (2 inches) Rule 406(6)(a)	✓	—	—	II
d.) Vehicle license Rule 406(7)	✓	—	—	II
e.) Current Act 64 decals Rule 406(6)(b)	✓	—	—	II

Comments See Sharon Burns - Vehicle not on-site
At time of inspection.

Form C
Transporter of Hazardous Waste

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Violation Class</u>
4. Is there evidence that hazardous wastes/constituents have been released or escaped at the facility? Rule 407(a)		✓		N/A

Comments _____

5. If vehicles are cleaned on site, are proper procedures followed including testing and disposal of wastewater.
Rule 407(b)

Comments Vehicles not stored on site ✓ N/A

6. Are facilities constructed so as to minimize release of hazardous wastes.
Rule 407(c) ✓ N/A

Comments _____

MANIFEST SYSTEM AND RECORDKEEPING

7. Are copies of completed manifests available for review and retained for three years? Rule 409(1), 40 CFR 263.22(a) ✓ I

Comments From various generators

8. Indicate the number of manifests examined 25

Comments Manifests generated at rate
of approximately 50/mo.

INSPECTION FORM C
Part 4 Rules
P.A. 64 of 1979

TRANSPORTER OF HAZARDOUS WASTE

Facility Name DETREX CHEMICAL Industries

	Yes	No	N/A	Violation Class
1. If contract hauler, does this transporter have a business license? Rule 403(1)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>I</u>
2. Does this transporter have authority to mix, combine or commingle? Rule 405(1)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>I</u>
a.) Do they comply with special conditions attached to their license?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>I</u>
b.) Does transporter comply with generator requirements. Rule 405(2) (use generator checklist)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>I</u>

Comments _____

3. Is this transporter authorized to operate a transfer facility as stipulated in the transporter license. Rule 404(1).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>I</u>
a.) If yes, does transporter comply with provisions of 40 CFR 265 Part I and 40 CFR 264.175 including containment, management of containers and inspections? Rule 404(3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>I</u>

Comments FACILITY IS A PART A plant which
STORES WASTE.

LAND BAN

Inspector: Dale DekrakerAddress: MICH. DNRTelephone No: (616) 456-5071

Solvent "F" List

GENERATOR CHECKLIST

I. HANDLER IDENTIFICATION

Detrex -- Chemical Industries 312 Ellsworth
A. Handler Name B. Street (or other identification)
Grand Rapids Mich. 49503 Kent
C. City D. State E. Zip Code F. County Name
Distribution of Raw Solvents
G. Nature of Business; Identification or Operations
Mid 020906767
H. EPA ID #
Sharon Burns (616) 454-9269
I. Handler Contact (Name and Phone Number)

RCRA LAND DISPOSAL RESTRICTION INSPECTION

APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

	Gen.	Treat	Store	Disp.	Trans.
A. <u>F-Solvent Wastes</u>					
1. F001	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. F002	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. F003	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. F004	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. F005	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

☒ Yes ☐ No ☐ NA

If yes, check the appropriate treatability group.

- ☐ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
☐ Pharmaceutical wastewater containing spent methylene chloride
☒ All other spent solvent wastes

GEN

B. Waste Analysis

1. F-Solvent Wastes

- a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

☒ Yes ☐ No ☐ NA

How was this determination made?

- Knowledge of waste

☒ Yes ☐ No

If yes, note how this is adequate: Wastes are spent "pure" solvents.

- TCLP

☐ Yes ☒ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

☒ Yes ☐ No ☐ NA

If yes, specify the waste stream:

F001 - F002

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

☐ Yes ☒ No ☐ NA

- d. How does the generator test F-solvent waste when a process or waste stream changes?

No changes anticipated due to nature of business.

C. Management

1. On-Site Management

Is waste that exceeds the treatment standards treated, stored, or disposed on-site?

☒ Yes ☐ No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

☒ Yes ☐ No

If yes, does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

☒ Yes ☐ No

If yes, does notification contain the following?

EPA Hazardous waste number(s) ☒ Yes ☐ No

Applicable treatment standards ☒ Yes ☐ No

Manifest number ☒ Yes ☐ No

Waste analysis data, if available ☐ Yes ☐ No N/A

Identify off-site treatment or storage facilities:

DETREX - Detroit (MID 091605972)

b. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

☐ Yes ☒ No

If yes, does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

☐ Yes ☐ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Applicable treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Waste analysis data, if available	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Certification that the waste meets treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Identify off-site land disposal facilities: _____

- c. If the waste is subject to a nationwide variance (e.g., solvent-water mixtures less than 1%), extension (268.5), or petition (268.6), does the generator provide notification to the off-site disposal facility that the waste is exempt from land disposal restrictions [268.7(a)(3)]?

☐ Yes ☐ No ☒ NA

D. Treatment Using RCRA 264/265 Exempt Units or Processes
 (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

☐ Yes ☒ No

If yes, list types of waste treatment units and processes:

INSPECTION SUMMARY

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TRANSPORTER CHECKLIST

TRANSPORTER REQUIREMENTS

- A. Does the transporter accumulate waste for more than 10 days [268.50(A)(3)]?

☒ Yes ☐ No

If yes, check the appropriate regulatory status:

☒ Interim status for storage
☐ RCRA permit for storage

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days: _____

- B. Does the transporter mix, combine, or recontainerize wastes?

☒ Yes ☐ No

- C. Is the waste treated in an exempt treatment process on-site?

☐ Yes ☒ No

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?

o F-solvent ☒ Yes ☐ No ☐ NA
 o California List ☐ Yes ☐ No ☒ NA

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

☒ Yes ☐ No

a. What date was the waste analysis plan last revised? Feb, 1988

b. Are analyses conducted on-site or off-site?

☐ On-site ☒ Off-site

Identify off-site lab: Detrex Lab in Southfield
Michigan

- c. Is F-solvent waste analyzed using TCLP?

☐ Yes ☒ No ☐ NA

d. Describe the frequency of sampling: As need arises
based on material present

- e. Describe procedures used to identify manifest discrepancies:

Review of all incoming waste
Shipments to determine nature of
waste.

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

☒ Yes ☐ No

B. Storage (268.50)

1. Are restricted wastes stored on-site?

☒ Yes ☐ No

If no, go to C, Treatment in Surface Impoundments.

2. If yes, check the appropriate method.

☒ Tanks
☒ Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

☒ Yes ☐ No ☐ NA

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

☒ Yes ☐ No

5. Do operating records agree with container labeling?

☒ Yes ☐ No ☐ NA

6. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

☐ Yes ☒ No ☐ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

☐ Yes ☐ No

If yes, state how: _____

7. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

____ Yes ____ No ☒ NA

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

____ Yes ____ No

8. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

____ Yes ____ No ☒ NA

TANKS ARE NO LONGER USED

C. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

____ Yes ____ No

If no, go to D, Treatment in Surface Impoundments.

2. Describe the treatment processes:

3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue from all treatment processes is less than treatment standards [268.7(b)]?

____ Yes ____ No

4. Describe frequency of testing treatment residuals:

5. Is dilution used as a substitute for treatment?

____ Yes ____ No